

1 Kristen T. Gallagher (NSBN 9561)
 2 Daniel I. Aquino (NSBN 12682)
 2 McDONALD CARANO LLP
 3 2300 West Sahara Avenue, Suite 1200
 3 Las Vegas, Nevada 89102
 4 Telephone: (702) 873-4100
 4 kgallagher@mcdonaldcarano.com
 daquino@mcdonaldcarano.com

5 *Attorneys for LinkUs Enterprises LLC*

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9
 10 SALVADOR MARTINEZ, in behalf of
 himself and all others similarly situated,

11 Plaintiff,

12 v.

13 LINKUS ENTERPRISES LLC; DOES 1
 through 50; inclusive,

14 Defendants.

15 CASE NO.: 2:21-cv-01119-RFB-EJY

16 **STIPULATION AND ORDER TO EXTEND
 TIME TO RESPOND TO PLAINTIFF'S
 AMENDED COMPLAINT (ECF No. 12)**

17 **(Third Request)**

18 Defendant LinkUs Enterprises LLC ("Defendant") and Plaintiff Salvador Martinez
 19 ("Plaintiff"), by and through their respective counsel of record, hereby stipulate to extending the
 20 time for Defendant to respond to Plaintiff's Amended Complaint (currently due August 16, 2021)
 21 up to and including August 30, 2021. ECF No. 12.

22 The parties are continuing to engage in discussion regarding potential resolution, including
 23 review of documents related to Plaintiff's claims. To allow such inquiry and permit the necessary
 24 time for the parties to work together in good faith to explore the possibility of potential resolution,
 25 the parties hereby agree that Defendant's response to the Amended Complaint shall be due on or
 26 before August 30, 2021.

1 This is the third request for an extension of time to file a responsive pleading to the
2 Amended Complaint. This request is not sought for any improper purpose or other reason of
3 delay.

4 Dated this 16th day of August, 2021.

5 McDONALD CARANO LLP

6 By: /s/ Daniel I. Aquino
7 Kristen T. Gallagher (NSBN 9561)
Daniel I. Aquino (NSBN 12682)
8 2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
kgallagher@mcdonaldcarano.com
9 daquino@mcdonaldcarano.com

10 *Attorneys for LinkUs Enterprises LLC*

THIERMAN BUCK LLP

By: /s/ Joshua D. Buck
Mark R. Thierman, Esq.
Joshua D. Buck, Esq.
Leah L. Jones, Esq.
7287 Lakeside Drive
Reno, Nevada 89511
mark@thiermanbuck.com
josh@thiermanbuck.com
leah@thiermanbuck.com

Christian Gabroy, Esq.
Kaine Messer, Esq.
GABROY LAW OFFICES
170 S. Green Valley Pkwy, Suite 280
Henderson, Nevada 89012
christian@gabroy.com
kmesser@gabroy.com

11 *Attorneys for Plaintiff*

12 **IT IS SO ORDERED.**

13 August 16, 2021

14 _____
Date

15 
16 _____
UNITED STATES MAGISTRATE JUDGE